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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

<p>PLUMBERS AND STEAMFITTERS LOCAL 60 PENSION TRUST, Individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>META PLATFORMS, INC. (f/k/a FACEBOOK, INC.), MARK ZUCKERBERG, DAVID WEHNER, SHERYL SANDBERG, and SUSAN LI,</p> <p>Defendants.</p>	<p>Case No.: 4:22-cv-01470-YGR</p> <p>[PROPOSED] ORDER APPOINTING LEAD PLAINTIFFS AND APPROVING LEAD COUNSEL</p> <p><u>CLASS ACTION</u></p>
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1 **WHEREAS**, the Court has considered the competing motions for Appointment of Lead
2 Plaintiff and Approval of Lead Counsel,

3 **IT IS HEREBY ORDERED THAT:**

4 1. Having reviewed all pending motions and accompanying memoranda of law, the
5 Court hereby appoints Menora Mivtachim Insurance Ltd., Menora Mivtachim Pensions and
6 Gemel Ltd., The Phoenix Insurance Company, Ltd., and The Phoenix Provident Pension Fund
7 Ltd. (collectively, “Menora and Phoenix”) as Lead Plaintiffs in the above captioned action.
8 Menora and Phoenix satisfy the requirements for Lead Plaintiffs pursuant to Section
9 21D(a)(3)(B)(iii) of the Private Securities Litigation Reform Act of 1995 (the “PSLRA”).
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11 2. Lead Plaintiffs, pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, have
12 selected and retained Pomerantz LLP as Lead Counsel for the Class in the Action.
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14 3. Lead Counsel shall have the following responsibilities and duties, to be carried
15 out either personally or through counsel whom Lead Counsel shall designate:

- 16 (a) to coordinate the briefing and argument of motions;
17 (b) to coordinate the conduct of discovery proceedings;
18 (c) to coordinate the examination of witnesses in depositions;
19 (d) to coordinate the selection of counsel to act as a spokesperson at pretrial
20 conferences;
21 (e) to call meetings of the plaintiffs’ counsel as they deem necessary and
22 appropriate from time to time;
23 (f) to coordinate all settlement negotiations with counsel for defendants;
24 (g) to coordinate and direct the pretrial discovery proceedings and the
25 preparation for trial and the trial of this matter and to delegate work
26 responsibilities to selected counsel as may be required; and
27 (h) to supervise any other matters concerning the prosecution, resolution or
28 settlement of this Action.

4. No motion, request for discovery, or other pretrial proceedings shall be initiated

1 or filed by any plaintiffs without the approval of Lead Counsel, so as to prevent duplicative
2 pleadings or discovery by plaintiffs. No settlement negotiations shall be conducted without the
3 approval of Lead Counsel.

4 5. Every pleading in this Action, and any related action that is consolidated with
5 this Action, shall hereafter bear the following caption:

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

9 IN RE META PLATFORMS, INC.
10 SECURITIES LITIGATION

Case No. 4:22-cv-01470-YGR

11 CLASS ACTION

12 THIS DOCUMENT RELATES TO:

[TITLE OF DOCUMENT]

13 6. When the document being filed pertains to all actions, the phrase “All Actions”
14 shall appear immediately after the phrase “This Document Relates To:”. When the document
15 applies to some, but not all, of the actions, the document shall list, immediately after the phrase
16 “This Document Relates To:”, the docket number for each individual action to which the
17 document applies, along with the name of the first-listed plaintiff in said action.

18
19 7. Counsel in any related action that is consolidated with this Action shall be bound
20 by the organization of plaintiffs’ counsel set forth herein.

21 8. Lead Counsel shall have the responsibility of receiving and disseminating Court
22 orders and notices.

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24 9. Lead Counsel shall be the contact between plaintiffs’ counsel, and shall direct
25 and coordinate the activities of plaintiffs’ counsel.

26 10. Defendants shall effect service of papers on plaintiffs by serving a copy of same
27 on Lead Counsel by overnight mail service, electronic or hand delivery. Plaintiffs shall effect
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1 service of papers on defendants by serving a copy of same on defendants' counsel by overnight
2 mail service, electronic or hand delivery.

3 11. During the pendency of this litigation, or until further order of this Court, the
4 parties shall take reasonable steps to preserve all documents within their possession, custody, or
5 control, including computer-generated and stored information, and materials such as
6 computerized data and electronic mail, containing information which is relevant or which may
7 lead to the discovery of information relevant to the subject matter of the pending litigation.
8

9 **IT IS SO ORDERED.**

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11 DATED: _____

12 HON. YVONNE GONZALEZ ROGERS
13 UNITED STATES DISTRICT JUDGE
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